

# NOTICE

U.S. DEPARTMENT OF TRANSPORTATION  
FEDERAL AVIATION ADMINISTRATION

N 8900.197

National Policy

Effective Date:  
9/14/12

Cancellation Date:  
9/14/13

**SUBJ:** Part 135 Training Program Review: Training/Checking Credit

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**1. Purpose of This Notice.** This notice requires principal operations inspectors (POI) to conduct a focused program review of Title 14 of the Code of Federal Regulations (14 CFR) part 135 certificate holders' approved training programs. The objective of this review is to identify and correct part 135 certificate holders' training programs that provide credit for previous training and/or qualification received from a different certificate holder. In addition, this notice provides guidance for POI approval of reduced training hour curricula for initial, transition, or upgrade training.

**2. Audience.** The primary audience for this notice is POIs responsible for the approval and surveillance of part 135 certificate holder training programs. The secondary audience includes 14 CFR part 142 Training Center Program Managers (TCPM) and other Flight Standards personnel in certificate-holding district offices (CHDO), branches, and divisions in the regions and in headquarters (HQ).

**3. Where You Can Find This Notice.** You can find this notice on the MyFAA employee Web site at [https://employees.faa.gov/tools\\_resources/orders\\_notices](https://employees.faa.gov/tools_resources/orders_notices). Inspectors can access this notice through the Flight Standards Information Management System (FSIMS) at <http://fsims.avs.faa.gov>. Operators can find this notice on the Federal Aviation Administration's (FAA) Web site at <http://fsims.faa.gov>. This notice is available to the public at [http://www.faa.gov/regulations\\_policies/orders\\_notices](http://www.faa.gov/regulations_policies/orders_notices).

**4. Applicability.** This notice applies to all part 135 certificate holder POIs, except POIs of:

- Single pilot part 135 certificate holders, as authorized by the issuance of Operations Specification (OpSpec) A040, or
- Other part 135 certificate holders that hold training program deviation authority in accordance with part 135, § 135.341(a), as authorized by the issuance of OpSpecs A037, A038, or A039.

**5. Background.** There have been numerous inquiries regarding a certificate holder's acceptance of training and/or evaluations previously completed by a crewmember while that crewmember was in the employment of another certificate holder. Regulations do not permit a certificate holder to take credit for training and evaluations conducted in accordance with another certificate holder's approved training program. Section 135.324 identifies what entities may

conduct training, testing, and checking of a certificate holder's crewmembers. Training, testing, and checking must only be conducted by the certificate holder, another certificate holder (certificated under part 135) under contract, or a training center (certificated under part 142) under contract. The contractor must conduct all training, testing, and checking in accordance with the contracting certificate holder's approved training program. All contractual arrangements must be authorized in OpSpec A031.

## 6. Terms Used in this Notice.

**a. Credit for Previous Qualification.** This is the erroneous practice of accepting documentation or certification that a crewmember has satisfactorily completed ground and/or flight training and/or an evaluation while in the employment of another part 135 certificate holder as meeting the requirements of the hiring certificate holder's training program.

**Note:** Some part 142 training centers have distributed training programs that provide credit for training/evaluations conducted by another operator. Such provisions are contrary to the intent, as well as the technical provisions, of part 135, and are not appropriate for inclusion in a certificate holder's approved training program.

**b. Evaluation.** The term "evaluation" refers to all testing (written and oral) and checks (e.g., proficiency, competency, line, etc.) that a certificate holder must conduct in accordance with the requirements of part 135 and the conditions of the certificate holder's OpSpecs.

## 7. Training Program Planned Hours.

**a. Requirements.** Part 135 does not require programmed hours to be defined within training programs. The hours associated with these programs are typically referred to as planned hours to avoid confusion with the requirements of 14 CFR part 121. Part 135 does, however, require each instructor, supervisor, or check pilot to certify the proficiency and knowledge of each crewmember upon completion of required training or evaluation. This certification may occur at any time when the instructor believes that the individual has reached the required level of proficiency during his or her scheduled training, provided that all elements and events of the approved training program have been successfully trained.

### **b. Reduced Training Hour Curricula.**

(1) Part 135 certificate holders may develop and submit for approval multiple curricula for a particular category of training, crewmember duty position, and aircraft make, model, and series (M/M/S). These curricula may have different planned hours based on the crewmember's previous knowledge and skill. For example, a part 135 certificate holder may develop initial training curricula for:

- Pilots that have previous experience in part 135 operations in the same aircraft and flightcrew member duty position;
- Pilots that have previous experience in part 135 operations in the same aircraft, but in a different flightcrew member duty position;

- Pilots that have previous experience in part 135 operations in a different aircraft; or
- Pilots that have previous experience in 14 CFR part 91, subpart K (part 91K) operations.

(2) In these examples, each curriculum would have different planned hours to reflect the crewmember's level of knowledge and skill related to the certificate holder's operation or aircraft.

**c. Limitations.** Reduced training hour curricula may be developed for initial, transition, or upgrade training, and must contain all the elements of the full curriculum. Reductions may be made in planned hours for aircraft-specific systems ground training and/or flight training based on a crewmember's previous knowledge and skill. However, reductions in planned hours based on a crewmember's previous knowledge or skill may not be made for certificate holder-specific modules, including, but not limited to:

- (1) Basic indoctrination (§ 135.329);
- (2) Hazardous materials (hazmat) (§ 135.505), except as provided for in § 135.505(c), if the crewmember works for more than one certificate holder concurrently;
- (3) Emergency training (§ 135.331);
- (4) Crew Resource Management (CRM) training (§ 135.330); and
- (5) Other certificate holder-specific modules, such as those required by a certificate holder's OpSpecs or those determined by the certificate holder's POI.

**Note:** Reductions may not be made to the planned hours for any portion of recurrent training (except for hazmat, as provided for in § 135.505(c), if the crewmember works for more than one certificate holder concurrently).

**Note:** An individual must also satisfactorily complete the certificate holder's evaluation and qualification modules (e.g., required written/oral exams, competency and proficiency checks, line checks, and operating experience) before the certificate holder assigns him or her as a required crewmember. Reductions may not be made to the evaluation and qualification modules.

**d. Prerequisites.** Certificate holders that choose to develop multiple curricula must clearly specify the prerequisites for entry into each specific curriculum. Examples of prerequisites include a competency check within the last 12 calendar-months, minimum total flight-hours, minimum flight-hours in type or class, as appropriate, and experience as a flightcrew member in part 135 operations.

**e. Crewmembers Employed by Multiple Certificate Holders.** A crewmember who is employed (directly or by contract) by multiple certificate holders concurrently must complete the applicable training curricula, including recurrent training, for each certificate holder. In addition,

the crewmember must satisfactorily complete each certificate holder's evaluation and qualification modules, including recurrent training.

**f. Recordkeeping.** The crewmember's permanent training record must include a certification and a record that verifies that the crewmember meets or exceeds the prerequisites of the reduced training hour curriculum. When the certificate holder enters the certification required by this paragraph in a computerized recordkeeping system, the certifying company official who made the determination must be identified in that entry.

**g. Previous Qualifications.** Regardless of an individual's previous qualifications, it is the certificate holder's responsibility to ensure that each individual is proficient and fully qualified in the certificate holder's operations and procedures prior to authorizing the individual to operate as a required crewmember.

**8. Action.** The focused program review discussed in this notice consists of two phases. Phase I will identify all part 135 certificate holder training programs that allow credit for previous training and/or qualification. Phase II will ensure that certificate holders revise identified training programs and submit them for POI approval.

**a. Phase I: Identification.** Within 90 days of the issuance of this notice, POIs must conduct a focused review of their assigned part 135 certificate holders' crewmember training programs to identify those curricula that provide credit for previous training and/or qualification. At the completion of this review, POIs must notify each identified certificate holder in writing that a revision to the training program is required in accordance with § 135.325(d) and the guidance in this notice. This notification must also state that the certificate holder must submit the revision in accordance with FAA Order 8900.1, Volume 3, Chapter 19, Section 2, Training Approval Process, to the POI for approval within 12 calendar-months.

**Note:** Retraining and rechecking of affected crewmembers is not required unless the POI believes that a proficiency or safety issue is involved.

**b. Phase II: Approval of Training Program Revisions.** POIs will follow the approval process in Order 8900.1, Volume 3, Chapter 19, Section 2. POIs must ensure that the training program revision does not allow credit for previous training and/or qualification. If the certificate holder's training program revision includes reduced training hour curricula, POIs must ensure that the training program revision meets the requirements of paragraph 7. POIs must carefully evaluate the reduced training hour curriculum entry prerequisites to determine if the prerequisites are sufficiently comprehensive to support the reduction in planned hours, considering the complexity of the aircraft and operation, the operational environment, the authorized operations, and other special authorizations typically found within the certificate holder's OpSpecs.

**9. Documentation.** POIs must record the actions directed by this notice for each assigned part 135 certificate holder (except for single-pilot part 135 certificate holders and other part 135 certificate holders that hold training program deviation authority in accordance with § 135.341(a)).

**a. Phase I.** For each assigned part 135 certificate holder, the POI must:

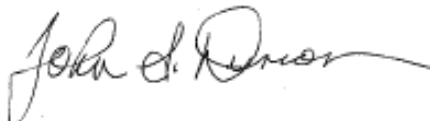
- (1) Open a Program Tracking and Reporting Subsystem (PTRS) record using code 1381;
- (2) Complete the “Designator” field;
- (3) Complete all required and any applicable optional fields;
- (4) Enter “NOCREDIT” in the “National Use” field (without quotes);
- (5) Enter comments, as appropriate; and
- (6) Close the PTRS record with a results code of Completed (C) when the Phase I actions are complete.

**b. Phase II.** For each assigned part 135 certificate holder that is required to submit a training program revision, the POI must:

- (1) Open a PTRS record using code 1307 when the certificate holder submits the revision;
- (2) Complete all required and any applicable optional fields;
- (3) Enter “NOCREDIT” in the “National Use” field (without quotes);
- (4) Enter comments, as appropriate; and
- (5) Close the PTRS record when the POI approval is complete.

**10. Additional Reference.** Refer to Order 8900.1, Volume 3, Chapter 19.

**11. Disposition.** We will incorporate the information in this notice into Order 8900.1 before this notice expires. Direct questions concerning the information in this notice to the Air Transportation Division (AFS-200) at 202-267-8166.

for 

John M. Allen  
Director, Flight Standards Service